

Exhibit A

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**[PROPOSED] ORDER GRANTING THE DRA PARTIES' MOTION FOR
ALLOWANCE OF AN ADMINISTRATIVE EXPENSE CLAIM**

Upon consideration of the *DRA Parties' Motion for Allowance of an Administrative Expense Claim* (the "Motion")², and the Court having found it has subject matter jurisdiction over this matter pursuant to section 306(a) of PROMESA; and it appearing that venue in this district is proper pursuant to section 307(a) of PROMESA; and the Court having found that the DRA Parties provided adequate and appropriate notice of the Motion under the circumstances and that no other or further notice is required; and the Court having reviewed the Motion and having heard the statements of counsel in connection with the Motion at a hearing held before the Court on _____ (the "Hearing"); and upon the record herein, after due deliberation thereon, the Court having found

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3566(LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801).

² Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Motion.

for the reasons set forth in the Motion that good and sufficient cause exists for the granting of the relief as set forth herein,

THEREFORE, IT IS HEREBY ORDERED THAT:

1. The Motion is **GRANTED** as set forth herein.
2. Pursuant to sections 503 and 507(a)(2) of the Bankruptcy Code, made applicable in these Title III cases pursuant to section 301(a) of PROMESA, upon entry of this Order, the DRA shall have an allowed administrative expense claim (the “DRA Allowed Administrative Claim”) in the Commonwealth Title III case equal to \$____, which amount may increase if the Commonwealth continues to retain the Act 30-31 Revenues after the date of this Order.
3. The DRA Allowed Administrative Claim shall be treated and entitled to payment in full in cash pursuant to the terms governing the payment of all administrative expense claims under the Third Amended Plan or any other plan of adjustment confirmed in these Title III cases, or as otherwise required by applicable law.
4. Notwithstanding any applicability of any Bankruptcy Rule to the contrary, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
5. To the extent required, the Commonwealth and the FOMB, as the Commonwealth’s representative in these Title III cases, are authorized to take all actions, and to execute all documents, necessary or appropriate, to effectuate the relief granted in this Order in accordance with the Motion and without further order of this Court.
6. The Court shall retain exclusive jurisdiction to hear and determine any and all disputes related to or arising from the implementation, interpretation, and enforcement of this Order.

Dated: _____

LAURA TAYLOR SWAIN
United States District Judge